

Before The
Federal Communications Commission
Washington, DC 20554

Comments on MB Docket No. 04-233

KADO-LP in Shreveport, Louisiana

Background:

KADO-LP is owned by Word Of Life Ministries, Inc. in Shreveport, Louisiana. The programming is all family friendly and KADO already airs seven hours of locally produced programming. We are moving forward in an effort to air more locally produced programming but due to the lack of mandatory carriage on any multi channel video distribution system that is quite a financial burden. KADO-LP has a very small staff and with the digital transition coming up, increasing programming requirements, staff, or localism efforts could make it impossible to grow or even continue broadcasting. With that in mind KADO files the following comments.

KADO also fully supports the comments filed by the Community Broadcasters Association in MB Docket No. 04-233

I -- Main Studio Rule

KADO-LP is not in favor of reinstating the main studio rule. The financial obligations of moving an existing studio or maintaining a studio in an undesirable or unsafe location would be an extensive financial burden. Finding a location inside the coverage area could be very difficult considering the small coverage area that low power stations are limited to. Having the flexibility to choose the location that works best financially is a must for broadcasters.

KADO-LP is not in favor of having the main studio location staffed 24 hours a day. Emergency communication with the station personnel can be easily established via a published emergency number that would forward to the appropriate member of the station's staff or several members of the staff.

II – Community Advisory Boards

KADO-LP is not in favor of forming community advisory boards to monthly or quarterly evaluate how the stations is meeting the needs of the community. LPTV broadcasters will always strive to have programming that the community wants to see. If not, we will go under financially.

Broadcasters, especially low power, have a built financial commitment to the community. Adding an advisory board is another financial burden that would divert station funds from the growth and expansion of local programming or digital conversion, to paper work and administrative matters. In short, for low power broadcasters, if you don't air what the community wants, your station won't be on for long.

III – Local Programming Regulations

As stated above. It is in the best interest of broadcasters to serve the community with the local content and broadcast.

IV – Class A filing window and Class A stations upgrading to full power

KADO –LP is in favor of both proposals. Allowing LPTV stations to apply for Class-A status helps ensure the continued community service of LPTV broadcasters. Increased coverage means better income. For LPTV that means better local programming and quality of service. For existing Class-A stations to be given the chance to upgrade to full power stations is a guarantee for an increase in local programming. All Class-A stations have a local programming requirement and would be glad to continue this given the opportunity to become full power broadcasters. Even if the full power status did not include an increase in coverage area or companion digital channel, Class-A stations would gladly welcome the opportunity.

Conclusion:

As a small LPTV broadcaster, our future is a little shaky. With the digital transition coming up, and the possibility of increasingly strict regulations, the financial obligations of continuing to broadcast, are considerable. We urge the FCC to consider options that help LPTV broadcaster to expand their ability to provide excellent community programming.

KADO also fully supports the comments filed by the Community Broadcasters Association.